Marlene H Dortch, Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street, SW
Washington, DC 20554

ORIGINAL

August 19, 2003

Re *Ex Parte*, MM Docket 99-25

Dear Ms Dortch:

On Monday, August 18, 2003 I and Michael Bracy of the Low Power Radio Coalition met with Anthony Dale of Commissioner Martin's office, and Paul Gallant of Chairman Powell's office; on Tuesday August 19 we met with Stacey Robinson of Commissioner Abernathy's office, and Jordan Goldstein of Commissioner Copps' office.

We met primarily to provide background information about low power radio. The attached documents, many of which have already been filed in this docket, cover the substance conveyed in our conversations. Specifically, we outlined the history of low power radio, briefly described the technical debate that has taken place with respect to low power radio, described Congressional action in the area, and provided information about the success of current LPFM stations. We used the attached diagram to explain third adjacent channels We also described to Mr. Dale that, geographically, the placement of LPFM stations can be envisioned as being located in the spaces between the overlapping circles of currently-existing full power radio service contours.

In addition, we were asked on several occasions about the pending request of National Public Radio to extend the time allotted for comments on the recently-released technical study performed by Mitre Corporation. We stated that our strongest priority was for the Commission to provide the statutorily-mandated report to Congress as soon as possible, certainly before the end of 2003. We were not inclined to oppose a short, 30-day, delay unless such a delay would impact the Commission's current timetable with respect to the Congressional report. We do oppose a lengthy, 90-day, extension. We stated we felt the NPR request stemmed from a good-faith desire to adequately analyze a lengthy technical document released a short time ago.

Consistent with the Commission's rules, two hard copies of this letter and its attachments are being filed with your office.

Sincerely,

Cheryl A. Leanza
Deputy Director

Attachments

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MEDIA ACCESS PROJECT

Low Power Radio Information Sheet (August 2003)

- The FCC first proposed starting a new low power radio service in January 1999, and approved the service in January 2000. This service will include very small stations. One-hundred watt stations will reach, at most, a 7 mile diameter Ten watt stations will reach a 3 mile diameter.

- After considering legislation that would completely eliminate low power radio, Congress instead adopted legislation that limits the number of radio stations that will be authorized. **The legislation ultimately adopted reflected Congress' decision to cut back, but not to eliminate, low power radio.**

  - This legislation did not eliminate the service, but did eliminate approximately 630 of the 1,200 applications filed at the time.

- The legislation required the FCC to commission an independent technical study on low power radio. The FCC released this Congressionally mandated study on July 11, 2003.

- In 2001, Senator McCain introduced legislation, S. 404, to reverse the legislation limiting low power radio Senator McCain remains interested in LPFM.

Facts about applicants

- The FCC accepted applications for 100 watt stations between May 1999 and May 2000. **Three thousand four hundred (3,400) non-profits** applied for a low power radio station The FCC has not yet initiated a 10 watt application cycle, useful in more congested urban areas

- **Applicants cover a wide range of ideologies and organizations.** For example, many conservative churches have applied alongside progressive churches.

- **Approximately 200 stations are now on the air!**

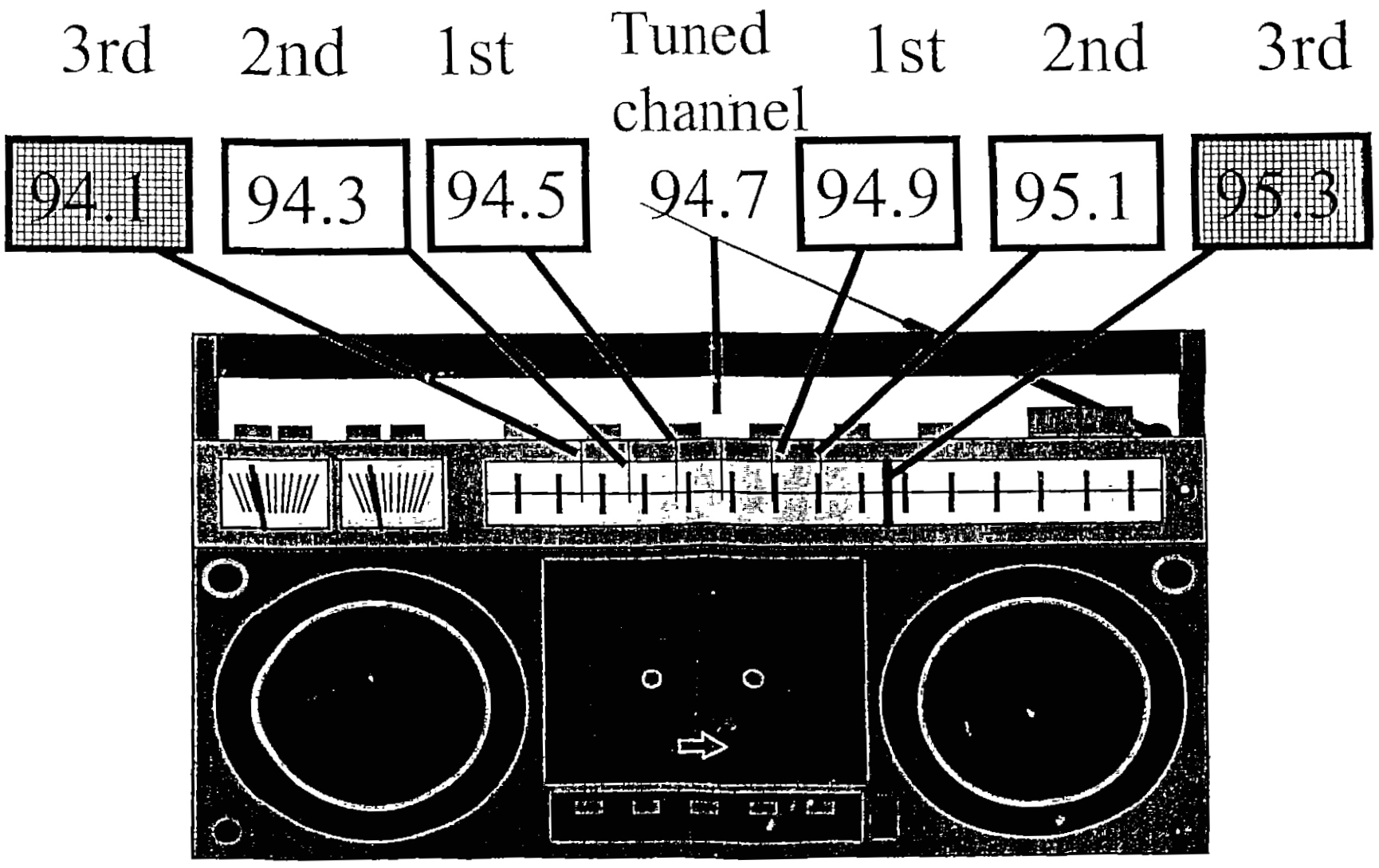
- Over 750 stations have completed the application process, have received construction permits, and now need only construct their stations to begin broadcasting Stations have only 18 months to get on the air, or they will lose their CP Despite our outreach efforts, approximately 50 probably lost their licenses at the end of 2002 because they are not able to construct their station before time runs out Approximately 850 have been dismissed or withdrawn, and approximately 1,700 applications remain to be processed, virtually all of which are applications competing with each other.

- The FCC will begin to process mutually exclusive applications in the near future.

- To get quick information about the numbers of applicants in various states, see the FCC's web page at http://www.fcc.gov/mb/audio/lpfm/index.html. Scroll down until you see the pink "LPFM Search" section.

1625 K ST NW SUITE 1118 WASHINGTON, DC 20006 PHONE (202) 232-4300
FACSIMILE (202) 466-7656 WWW.MEDIAACCESS.ORG

1st, 2nd & 3rd Adjacent Channels



Summary of Anti-Low Power Radio Legislation, Public Law 106-553

The legislation takes the following steps:

- Reverses the FCC's decision with respect to interference protection by putting back "third adjacent protection."

- Requires the FCC to hire an independent third party to conduct a technical test in 9 markets, spread among rural, suburban, and urban areas, and to solicit public comment on the test.

- Requires the FCC to provide a report to Congress on the technical test, the economic impact on small broadcasters (including minority broadcasters), reading for the blind services, the transition to digital terrestrial radio (also known as IBOC), and FM radio translators (including the need for third adjacent protection for translators.)

- Does not allow the FCC to alter the interference protection standards or expand eligibility for low power radio unless Congress passes additional legislation authorizing it to do so.

- Prevents any individual who has engaged in unlicensed broadcasting from getting a low power radio license

Executive Summary

On October 25, 2000, Congress passed HR 4942, Section 632(b) of which required that the Federal Communications Commission (FCC) "conduct an experimental program to test whether low-power FM radio stations will result in harmful interference to existing FM radio stations if such stations are not subject to the minimum distance separations for third-adjacent channels required by Subsection (a) " The Commission was also directed to "select an independent testing entity to conduct field tests in the markets of the stations in the experimental program " The legislation stated that "up to nine" different markets could be considered In July 2001, The MITRE Corporation was selected to perform this work, based on its technical knowledge, engineering experience, independence and freedom from any actual or perceived conflict of interest

MITRE competitively selected an experienced, independent subcontractor to perform the field measurements, which were made during the fall of 2002. Before starting the measurements, MITRE approved a set of detailed subcontractor-developed test plans and test procedures Measurements were made at up to eight sample receiver locations for each of seven different low-power FM (LPFM) transmitter sites. The selected sites covered a diverse range of geographic, population density, market size and program material combinations The measurements included the operation of the test LPFM station at the maximum power and antenna height values that are specified in the FCC Rules Measurements were also made with the LPFM transmitter turned off to identify possible cases where there was receiver degradation even in the absence of LPFM transmissions

Six different commercially available FM receivers were tested, covering a range of cost and portability options. An analog subcarrier receiver that provides reading services to the visually impaired (RSVI) was included in the set So were typical auto, home, clock, boombox and small personal receivers An FM translator was also tested to determine the effect that a third-adjacent LPFM station could have if it interfered with the translator's input receiver

The subcontractor submitted its final measurement data report to MITRE in March 2003, along with studio-quality digital recordings of the output of the five or six receivers under test for each measurement location MITRE studied the field measurements and recordings, and analyzed the results in terms of the feasibility of relaxing or eliminating the third-adjacent protection requirement for LPFM Stations. That analysis is described in Section 2 of this report A theoretical analysis was also done to ensure that the measurements were consistent with well established engineering principles. That analysis is contained in Section 4

MITRE's tasking from the FCC also required an evaluation of the potential impact that third-adjacent LPFM stations might have on the transition of FM broadcasting to a digital

format MITRE procured the necessary digital broadcasting and receiving equipment and made laboratory measurements to determine the effects that LPFM stations could have on these operations. The digital analysis is described in Section 3 of this report.

Summary of Findings

In summary, based both on the measured data and the theoretical analysis, MITRE has concluded that LPFM stations can be operated on third-adjacent channels with respect to existing "Full Power" FM (FPFM) stations provided that relatively modest distance separations are maintained between any LPFM station and receivers tuned to the potentially affected FPFM station These required separations are on the order of a few tens of meters in the best case, to slightly more than a kilometer in the worst case. MITRE has determined, based both on the field measurements and its own theoretical analysis, that no case of harmful third-adjacent LPFM interference will exist outside of an area with a radius of 1100 m surrounding the LPFM antenna, for an LPFM transmitter Effective Radiated Power (ERP) of 100 W or less and an LPFM antenna height of 30 m or less

The 1100 m separation value applies to LPFM locations that are near the protected contour of the third-adjacent channel FPFM station In other cases where the LPFM station is closer to the FPFM station, this radius will become much smaller – on the order of tens of meters, to one or two hundred meters, depending on the proximity. A formula was developed, based on the field measurements and the theoretical analysis, to compute the distance separation that is required between LPFM stations and receivers tuned to FPFM stations on third-adjacent channels. The formula accounts for the relative locations of receivers, LPFM stations and FPFM stations. This equation is shown in Section 5 2.1 and could be used to develop licensing rules for LPFM stations in lieu of the third-adjacent channel separation rules now in effect

In the measured data, LPFM interference was not strongly correlated with variations in terrain or program material type. The measurements also did not show a strong dependence on LPFM antenna height. MITRE's model (Section 4) does show a dependence on antenna height because higher LPFM antennas could extend the distance to which a second-power propagation law applies This factor argues in favor of retaining the current Rules regarding reduction of the LPFM ERP for antenna heights above 30 m.

In terms of the impact of an LPFM station due to interference on the audience of an FPFM station, in the worst case measured, the fraction of the protected coverage area of an existing station that could be subjected to harmful interference is 0.13%. In most other cases, this fraction is orders of magnitude smaller

The measurements show that, for the one case examined where the affected FPFM station carries RSVI, there was no significant LPFM interference to the RSVI receiver when it was located more than 80 meters away from the LPFM antenna However, at some distances

greater than 80 meters, the RSVI signal was degraded even in the absence of LPFM transmissions No significant interference was noted in the auto or home receivers at distances greater than 130 meters, or in any of the other non-translator receivers at a distance exceeding 550 meters. However, interference still might be possible at greater distances under certain unfavorable circumstances In general, however, the required LPFM-to-receiver separations will vary according to the formula given in paragraph 5.2.1 of this report

Paragraph 5 1 2 of this report identifies a relationship that was developed, on the basis of the field measurements, to compute the distance separation that is required between FM translator receiving antennas and LPFM stations During the field tests, the LPFM antenna was placed in the main beam of the translator receiver's antenna at a distance of about 450 m The LPFM power was varied from zero to 100 W. No harmful interference was seen for an LPFM power of 2 W or less at that distance, in the main beam of the translator receiver. Taking into account a typical translator receiver's antenna pattern, a 100W LPFM station can be as close as 0 9 km to a translator that is itself operating at the protected contour distance from its primary station, if the LPFM antenna is 90° or more off the translator antenna's main beam axis (i e , gain is 0 dBd or less) As the LPFM station approaches the translator's main beam axis, this value increases to about 3 2 km.

The digital analysis has shown that the iBiquity IBOC system is very robust and performed about as well in the presence of LPFM signals as the analog car radio used in the tests As a result, no interference from LPFM stations to digital receivers is likely to occur at a distance of more than 130 m, even at the FPFM protected contour distance.

THE NEWSPAPER ABOUT PUBLIC TELEVISION AND RADIO

Current

Aug. 4, 2003
Vol. XXII, No. 14

Interference study finds room for more low-power FMs

By Mike Janssen

Battling over low-power FM could resume with the release of a study that suggests permitting microstations closer to their full-power neighbors

The study, conducted by the nonprofit tech research firm MITRE Corp and released last month, recommends that the FCC license LPFM stations on third-adjacent channels to full-power stations—a prospect that once drew strong criticism from NPR and others in public radio.

Following that suggestion could engender many more of the tiny, low-wattage noncommercial stations That would give more wannabe broadcasters access to the airwaves but also permit interference that could eat away at the fringes of public radio signals.

The FCC now keeps LPFMs certain land distances from full-power stations if they use third-adjacent frequencies—that is, frequencies within 0 6 megahertz Following that rule reduces the number of potential LPFMs by 80 percent, according to the FCC.

The rule could be relaxed, the MITRE study says, "provided that relatively modest distance separations are maintained between any LPFM station and receivers tuned to the potentially affected LPFM station "

MITRE did not recommend waiving distance separations entirely Instead, it devised a formula for determining spacing Resulting distances could range from a kilometer to a "few tens of meters "

The FCC created the new class of stations in 2000 under Democratic Chairman Bill Kennard, who wanted to diversify media control Based on its own research, the commission dropped the third-adjacent protections Congress overruled the FCC in 2001, ordering it to uphold the protections Low-power advocates complained that the reversal squeezed low-power signals out of larger markets. Congress ordered the agency to commission an independent interference study, hence the MITRE report

As of late May, 113 LPFMs were licensed to broadcast, and more than 500 others have received construction permits preliminary to licensing, according to the National Federation of Community Broadcasters Almost half of LPFM permits and licenses have gone to religious groups (chart, page 17)

Continued on page 17

LPFM

Continued from page 1

The FCC has almost finished processing uncontested applications and is preparing to settle mutually exclusive filings, says Cheryl Leanza, deputy director of the pro-LPFM Media Access Project

Low-power stations are limited to using small, 100-watt—or even 10-watt—transmitters (The FCC has not yet accepted applications for 10-watt stations)

The introduction of the service prompted cheers from grassroots broadcasters but upset NPR and commercial broadcasters, who feared that the stations would interfere with their signals and radio reading services for the visually impaired It remains to be seen how the MITRE study will reshape the debate.

The report discounts or plays down a number of interference worries.

- LPFM signals did not interfere with a radio reading service receiver as long as the transmitter and receiver were at least 80 meters apart.
- Stations transmitting digitally experienced no more interference from LPFMs than analog broadcasters
- Interference "was not strongly correlated with variations in terrain or program material type " NPR had argued that quieter public radio fare such as news and classical music could be especially vulnerable to interference."

Tradeoff: regional or local?

Most stakeholders in the interference debate have yet to digest the complex, 308-page report. Some have handed it off to engineers for analysis. Reactions so far sound like echoes from the past, with established broadcasters advising caution and LPFM advocates upbeat and hopeful.

"The tests pretty much bore us out," says Pete Tridish of the Prometheus Radio Project, a Philadelphia group that lobbies for micropower broadcasting and has argued against third-adjacent protections for LPFMs.

But Prometheus and MITRE risk playing down the need for continued spacing of LPFMs, says Scott Hanley, g m. of WDUQ in Pittsburgh and an NPR Board member. If the spacing formula is ignored, he says, LPFMs could knock out the service of full-power stations like his to "city blocks' worth" of urban listeners.

NPR declined comment on the study, but David Noble, chair of government affairs for the International Association of Audio Information Services, said he would still support third-adjacent protections based on his quick scan of the study.

One observer, however, has changed his mind since the advent of LPFM. Broadcast engineering consultant Doug Vernier, a now-retired Iowa pubradio manager, supported third-adjacent protections in 1999. Since then, experience with translators on second- and third-adjacent frequencies to full-power stations has proven to him that LPFM's current protections may be needlessly strict.

"There's, frankly, enough spectrum out there that third-adjacents aren't going to cause a significant problem to public radio at this point," he says. "I wouldn't have said that several years ago, but I think that we have seen enough proof that radios are good enough today that it isn't a huge issue The MITRE study is more proof of the pudding "

NPR and commercial broadcasters have argued that third-adjacent signals would interfere with reception within their FCC-protected geographic contours, Vernier says, but their greater fear is that LPFMs will obscure their signals in the lawless areas beyond the contours They would lose distant listeners if more LPFMs are licensed and would have no recourse at the FCC

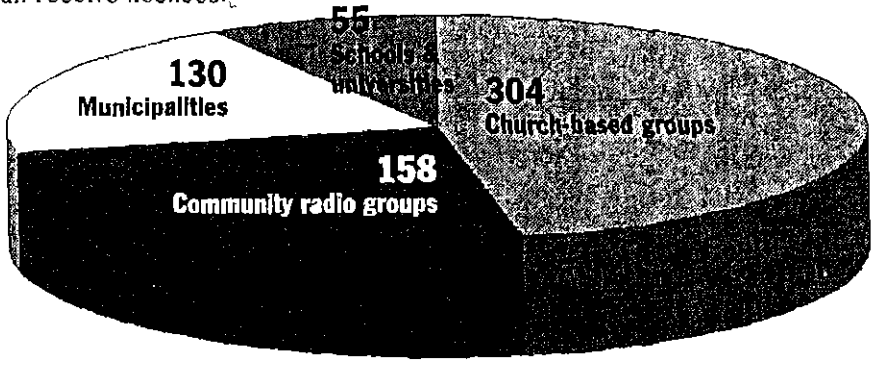
"It's a tradeoff between what low-power can give a local area as to what a regional public radio station can give a regional area," he says

In Vernier's view, looser rules won't hurt public radio, considering its growing audiences "And I think there is a need for low-power, community-based stations," he says. "The question is, is there a need in one community for 20 of them?"—a scenario he says could occur without third-adjacent protections.

The FCC has asked for reply comments on the MITRE study by Sept. 12 The agency would have to win congressional approval to remove third-adjacent protections, raising the chance that the low-power debate could quickly become political again Sen John McCain (R-Ariz), who championed LPFM in 2000, has already expressed interest in revisiting the issue, according to *Radio World*. ■

Who will operate LPFM microstations?

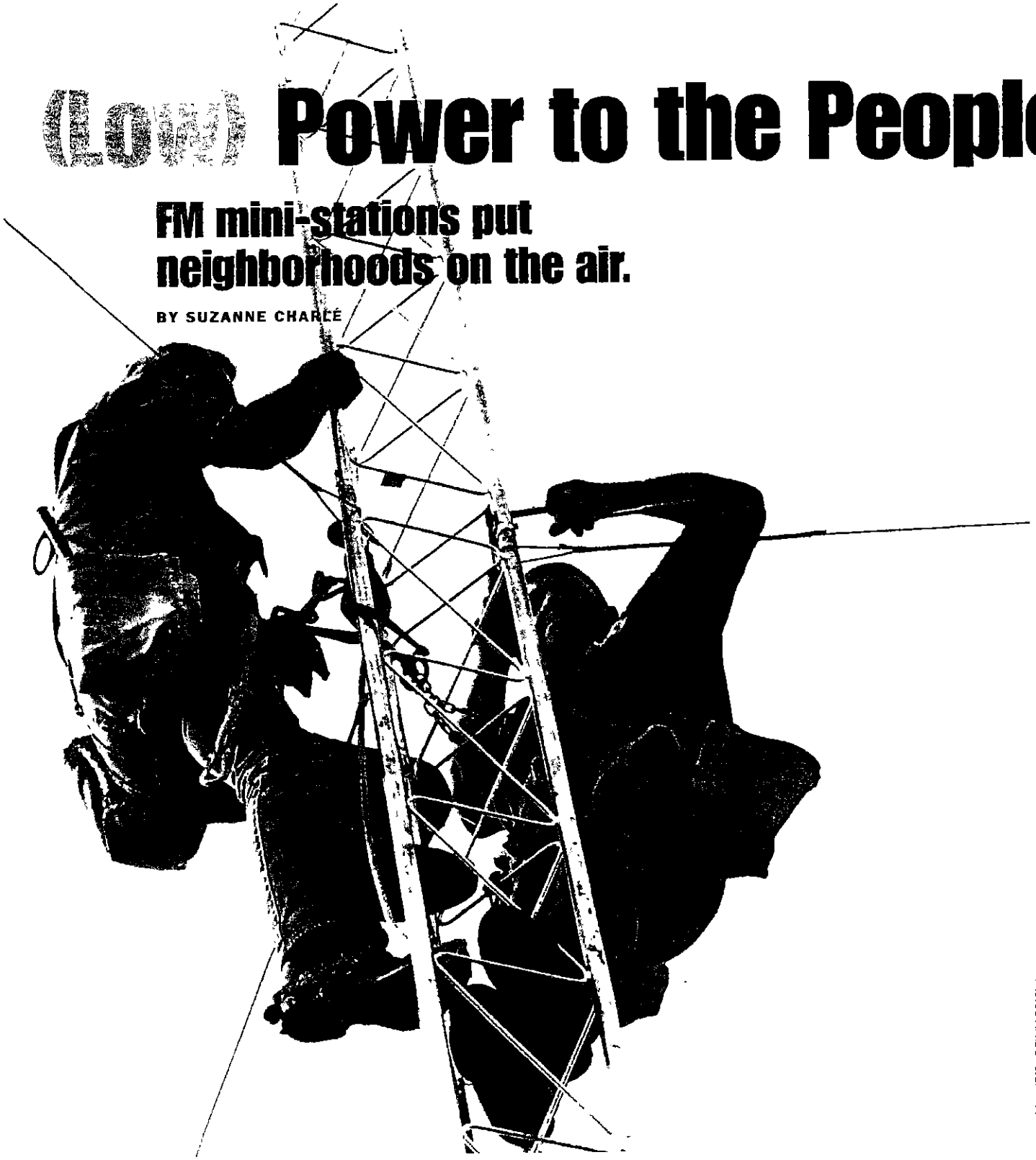
As of late May, this is the breakdown of **647** construction permits and licenses issued by the FCC, as tallied by the National Federation of Community Broadcasters. CPs are granted first; operators that follow through on plans can receive licenses.



(Low) Power to the People

FM mini-stations put neighborhoods on the air.

BY SUZANNE CHARLÉ



PHOTOGRAPHS BY SUZANNE CHARLÉ

Opelousas, La.—At the headquarters of the Southern Development Foundation, a local nonprofit group, enthusiasm pulsed like the zydeco music filling the small white frame house. Inside, volunteer technicians worked their way through a maze of cables and electronics. Outside, engineers made final adjustments to broadcast antennae.

Tossing his cigarette onto the lawn, a building contractor named Andres Guidry scrambled onto the roof and up the new radio tower, the spurs jingling on his cowboy boots. On his signal, his partner and others tugged on the guide rope, and the antenna swung wildly up into the sky. Leaning from his precarious aerie, Guidry grabbed the flying piece of metal and wrestled it into place.

The three-day radio "barn raising" in the southwest Louisiana town of Opelousas, population 22,860, was off to a good start. Dozens of radio engineers, students, lawyers, musicians and activists had flown, driven and hitched rides from places as distant as Oregon and upstate New York to help the Southern

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Suzanne Charlé is a freelance writer based in New York City.

Development Foundation build a low-power FM radio station—one of 511 noncommercial groups recently granted construction permits by the Federal Communications Commission.

With 100 watts—the power of the average light bulb—these stations beam shows to their communities, typically within a radius of three to four miles. Their wattage is low compared with the commercial stations whose 50,000-watt signals can be heard for 100 miles, but they have a powerful ability to amplify voices seldom heard. In an era of increasing consolidation of media, LPFM stations—owned by churches, charities, environmental groups, schools and governmental agencies—are the Davids to corporate media Goliaths such as Clear Channel and Viacom.

The radio barn raising was organized by Prometheus Radio Project, a Philadelphia-based group. Its technical director, Dylan Wrynn, who is better known as Pete Tridish, his on-air handle from his pirate radio days, welcomed the volunteers and S.D.F. staff. "We're all here to learn, and also to take the opportunity to make a little history," said Tridish. Over the weekend, there would be workshops on topics ranging from radio production to funding techniques to new technologies—how to put a station together both physically and financially.

S.D.F., the first civil rights organization to own its own radio station, came to prominence in the early 1960's, when it launched cooperatives to help local farmers get fair prices. "We work with the poor and the marginalized, and we want to be sure their voices are heard," said Lena Charles, president of S.D.F.

Volunteers prepare to launch a new low-power FM station in Opelousas, La. *Opposite* **Volunteers install the station's radio tower.**

Among other things, S.D.F. plans to use the station to promote zydeco, the traditional black creole music that was born in Opelousas and St. Landry Parish. Twenty-one years ago, S.D.F. launched the Southwest Louisiana Zydeco Music Festival. At that time only a few bands were still playing zydeco, said Mona Kennerson, S.D.F.'s development director and news producer of the new station. Now, there are more than 150 zydeco bands in the region, and the annual festival attracts some 20,000 people.

John Freeman, a retired Bell South executive and chief operating officer and station manager of S.D.F., ticks off the new radio station's schedule: Sunday morning gospel, perhaps broadcast live from the Holy Ghost Church across the road; weekday mornings that start with jazz or rhythm and blues; "Town Talk," which focuses on community issues, followed by hard-core zydeco from around the area.

This type of music is an endangered species on commercial radio stations, according to Michael Bracey of the Future of Music Coalition. Drive across the United States, he says, and you'll hear pretty much the same tunes for 3,000 miles. Important elements of American culture—zydeco, jazz, the blues—are all hard to find on the commercial airwaves, and classical music and opera have all but vanished. In large part, this reflects changes in the radio industry since the 1996 Telecommunications Act eliminated a cap on nationwide station ownership and increased the number of stations a corporation can own in a single market. In June, the F.C.C. voted to relax ownership rules even further. A 2002 report published by the Future of Music Coalition, *Radio Deregulation: Has It Served Citizens and Musicians?,* states: "This legislation sparked an unprecedented period of ownership consolidation in the industry with significant and adverse effects on musicians and citizens."

Today, nearly 219 million Americans—96 percent of those 12 and over—tune into 13,012 radio stations for news, sports, weather, traffic, music and talk. According to Robert McChesney, a media scholar, radio before 1996 was among the least concentrated and most economically competitive media. In 1990 no company owned more than 14 of the 10,000 stations, with no more than two in a single local market.

Today, two corporations, Clear Channel and Viacom, claim 42 percent of listeners and 45 percent of industry revenues. Since the passage of the 1996 act, Clear Channel has grown from 40 stations to 1,240 stations, 30 times more than Congressional regulation previously allowed.

McChesney says that for a democracy to be effective, "you need some sort of media system that's going to do two things. First of all, it's going to ruthlessly account for the activities of people in power and people who want to be in power so you know what they're actually doing. Secondly, it's going to give a wide range of opinions on the fundamental social and political issues that citizens need to know about." The U.S. media, he says, fail to meet that obligation.

Proponents of low-power FM argue that these tiny stations can contribute mightily to strengthening democracy. LPFM stations and Internet broadcasting (in which programs are streamed over the Internet) can offer local programming, a type of community-based narrowcasting harking back to radio's

'Low-power FM enhances democracy on the dial: It fosters new opportunities for true community radio to flourish in an age marked by the increasing consolidation and homogenization of the industry and the marketplace of ideas.'

early days in the 1920's, when, according to McChesney, fewer than 5 percent of U.S. radio stations were operated commercially.

The uniform landscape created by corporate broadcasting gave birth to a renewed interest in LPFM. At first, most of these stations were run by "pirates," broadcasters who beamed programs to their communities without obtaining licenses from the F.C.C. After the passage of the Federal Communications Act in 1996, hundreds of pirate stations sprang up across the nation. As fast as the F.C.C. closed the stations, more would spring up, Pete Tridish recalls. Thanks to the portability of low-power broadcasting equipment, curbing pirates was like trying to stop mushrooms from growing after spring rains.

William Kennard, chairman of the F.C.C. during the Clinton Administration, was determined to crack down on the pirates and launched a series of raids. In 1998 the pirates fought back in the courts and in the court of public opinion. They demonstrated in cities across the nation, winding up the campaign in the autumn in Washington, D.C. At a debate at the Freedom Forum, they persuasively argued the case for the public's right to the airwaves. Their voices were heard: Newspapers picked up the story, portraying the low-power radio D.J.s as Robin Hoods of the airwaves.

Kennard also heard them. The F.C.C. had essentially stopped licensing low-power radio stations in the 1970's in an effort to strengthen full-power radio stations' finances. The commissioner, who backed Equal Opportunity Rules requiring stations to account for their hiring practices, recognized the importance of diverse voices and minority ownership, which had decreased since 1996. With the help of the National Lawyers' Guild Center for Democratic Communications in San Francisco and the Media Access Project, a nonprofit group based in Washington, the low-power radio advocates persuaded the F.C.C. commissioner to open a public comment period regarding the possibility of granting new licenses.

LPFM supporters sprang into action. Tom Ness, co-publisher of Jam Rag magazine in Detroit, successfully organized bands to sign comments and then persuaded 45 cities to weigh in on the LPFM proposal. In Minneapolis, a group called Americans for Radio Diversity filed comments. Kennard and F.C.C. employees were impressed by the number of responses, more than 3,500, which were overwhelmingly in favor of the new local stations. In January 2000 the F.C.C. announced that it would again accept applications for low-power FM licenses. Kennard, who had been a D.J. in his school days, wrote about the possibilities in an op-ed piece for the Washington Post: "Low-power FM will allow schools, churches and other local organizations to use the public airwaves to make their voices heard. In short, low-power FM enhances democracy on the dial: It fosters new opportunities for true community radio to flourish in an age marked by the increasing consolidation and homogenization of the industry and the marketplace of ideas."

Within months, 3,200 groups applied, including the Center for Hmong Arts and Talent in Minneapolis; El Comite de los Pobres, a group of Latino workers and farmers in Fresno, Calif.; and a florists club in Newton, Ga. A loose coalition banded together to support the LPFM initiative. The United Church of Christ and the United Methodist Church's General Board of Global Ministries helped guide applicants through the tangled licensing and implementation processes. Cheryl Leanza, deputy director of the Media Access Project, prepared directions on how to apply for a station license as well as legal information on regulations that would increase access to the radio spectrum. Michael Brown, an engineer in Portland, wrote "Low-Power FM Equipment Guide." The Independent Media Center trained grass-roots organizations to gather and produce news. When representatives of Prometheus weren't out on the road drumming up interest, they were filing comments with the F.C.C.

Negative response was thunderous from existing broadcasters who, according to the F.C.C. rules, were not allowed to obtain new station licenses. In an official statement, Edward O. Fritts, president and C.E.O. of the National Association of Broadcasters, called LPFM a "boneheaded" initiative. Low-power stations, he claimed, threatened the transition to digital radio broadcasting by taking the digital space (which, it seems, the commercial broadcasters had expected to be theirs) and "will likely cause devastating interference to existing broadcasters."

In fact, the F.C.C. rules regarding the frequency space between neighboring channels already meant that there would be no channels available in crowded markets such as New York and Los Angeles. Moreover, F.C.C. engineers, after a formal study, had concluded that low-power stations could be introduced without creating interference with existing stations.

The N.A.B. was not satisfied and launched a campaign to woo Congress. It was eventually joined by National Public Radio,

A Larger Voice for Citizens

In the past decade information technology has profoundly changed the way people do business, seek entertainment, keep themselves informed and get involved in civic life. The Ford Foundation's media policy and technology portfolio supports a range of efforts to inform the public about issues related to these changes. This work, part of the foundation's Knowledge, Creativity and Freedom program, recognizes that the free flow of ideas and information is essential to democracy.

A grant to the New America Foundation funded the creation of "The Citizen's Guide to the Airwaves," a graphic depiction of the radio spectrum (p. 36). The hope is that by educating journalists and the general public about these issues—usually the domain of experts and "techies"—engaged citizens can help ensure fair and equitable use of this public resource. This is just what several foundation grantees have accomplished for low-power FM radio (p. 32). Although LPFM takes up a relatively small part of the spectrum, it is a vital way for new voices to be heard.

which argued that LPFM would disrupt efforts to extend the range of existing public stations, interfere with radio reading services for the blind and slow the advent of digital radio by taking up space NPR hoped to use.

In response, Congress voted in December 2000 to decrease the amount of space on the dial for low-power stations. As a result, the F.C.C. scaled back its rules and more than three-quarters of the proposed station licenses were revoked. For the most part, only applicants in rural areas could get a place on the spectrum. A Washington Post editorial called the anti-LPFM campaign a "low-power mugging."

Nevertheless, some 73 new LPFM stations are on the air today, and a total of 511 permits to build have been issued. About half of those have been given to churches and another block to government agencies.

Applicants in second-tier cities will have to wait until the results of the Congress-mandated study are released. If the study finds LPFM offers no interference, the landscape could totally change, says Nan Rubin, who has built two community stations and helped start another 50. If the original F.C.C. recommendations are approved, even areas just outside major cities might be sites for LPFM stations: "We're talking Westchester, Queens and Brooklyn," Rubin says.

In addition to running more radio barn raisings, Tridish and his colleagues at Prometheus are assembling a public database (www.cradlebase.org) that can be used by applicants and LPFM stations to share information and, eventually, music. Kai Aiyetoro, director of the National Federation of Community Broadcasters's LPFM program, is helping stations draw up budgets and get better buys on equipment. Alan Corn, an attorney with the National Lawyers' Guild, is focusing on local issues, challenging groups that have illegally filed multiple applications.

Advocates for LPFM are hoping that the stations now up and running will persuade the public and Congress that there should be more such stations, not fewer. WRYR 97.5, a station on the Chesapeake Bay in Maryland run by South Arundel Citizens for Responsible Development, was the only station to gather all of the local candidates in the last election for a debate. It's also a place for the bay's watermen to tell stories of life on the water and for scientists and environmentalists to discuss the effects of development.

On the other side of the continent, KRBS 107.3 is celebrating its first anniversary in Oroville, Calif.—a gold-rush town now populated for the most part by retirees, people on public assistance, and the people who serve them. According to the city manager, KRBS 107.3 helps to pull the town together. On air each week is jazz, Native American affairs, Croatian polka, Hmong folk and Thai pop, news from Laos and a political show, "By the People, For the People." "We're up to 54 D.J.s now," says Marianne Knorzer, one of the founders. ■

Young People Create a New Sound

Chicago—Motorists waiting at the stoplight in front of a glassed-in broadcast studio in Pilsen, a mostly Mexican neighborhood just west of downtown Chicago, shimmy their shoulders to Latin rock beats blaring from the outdoor speakers. D.J.s in the booth grin when drivers fumble with the radio dial, looking for the studio's signal before the light changes.

The station is WRTE-FM, better known as "Radio Arte," a youth project of the Mexican Fine Arts Center Museum. With a low 73-watt transmitter, WRTE's signal can be hard to pick up even a few miles from its broadcast booth. But the station, run almost entirely by people under 22 years of age, has made itself heard throughout Chicago and around the world.

The station stages two or three live music events a year, which draw visitors from across Chicago. Radio Arte students brought Lila Downs to Chicago for the first time in 2001, a fact they mention to anyone who knows her songs from the soundtrack of "Frida," the acclaimed 2002 film by Salma Hayek. Last year, the station invited Nortec Collective, a D.J. collective from Tijuana, to make its Chicago debut. Radio Arte broadcasts 24 hours a day on the World Wide Web, where it attracts listeners from five continents.

"Our students are looking to create a new sound in radio," says Yolanda Rodriguez, the station manager. "They don't just want to duplicate what they hear on commercial stations or National Public Radio"

The fresh sounds of Radio Arte come out of a two-year training program that has schooled hundreds of local youths, mostly high school and community college students, in radio production, broadcast writing and voice technique. After a few months of coursework, students go on the air — in English or Spanish — with a mentor for nine months. In their second year at the station, they participate in a larger project, a music program or documentary series, for example.

In addition to giving a forum for young people whose tastes and experience run outside the mainstream, Radio Arte has brought fresh eyes and ears to the community. Gay youths produce "Homofrecuencia," a weekly Spanish-language program about coming out as a teenager. Jorge Valdivia, 28, the community outreach coordinator at the station, says that a radio with headphones seems safer and more anonymous for closeted teens than a book or magazine article. Young producers scour the Internet for new music. By spotlighting artists who play "Rock en Español" from South America and Europe, the station's shows have won Web listeners around the world.

On the news front, Radio Arte airs documentaries on subjects ranging from police shootings to teenage drug use. This summer, the station plans a 10-segment look at housing displacement in Chicago called "Uprooted." "We see this from the perspective of people who have to leave their homes and communities," says Sylvia Rivera, 22, who is producing the series with four students, ages 16 to 22. "People in public housing are being forced out of their communities because the city is tearing down the developments. People in Pilsen have to move because they can't afford the rent after gentrification."

"We didn't know what gentrification was when we started this project," says Rivera, who was a member of the 1997 training class and has since worked part time at the station. "We had never been to a public housing project. We really had no idea what was going on in our own city." Today, she says she wonders how to fit everything they've learned into 10 half-hour broadcasts. ■

—Ron Feemster

Prometheus Radio Project
www.prometheus.tao.ca
prp@tao.ca215-476-2385

We'd like you to meet some of the groups that will be able to serve their community with a new LPFM station

- The **Southern Development Foundation** is excited to start up their Low Power FM station this year Based in Opelousas, Louisiana, this organization sponsors agriculture programs, leases land to farmers, raises money for scholarships for needy kids and helps people learn to read, in addition to sponsoring a popular zydeco festival **Michael Levier explains: "You've got local radio stations that are owned by larger companies. There should be some programming concerning the music that is from here, and the people from here. But there's not."**

- **The South Arundel Citizens for Responsible Development (SACReD)** have been working to control sprawling development In the Chesapeake Bay area. SACReD was granted one of only 4 licenses issued in the state of Maryland, and plans to continue its focus on threats to the local environment However, SACReD member Michael Shay promises that on their station **"All sides will be represented... There is nothing better than an informed community making informed decisions."**

Unfortunately, many more groups were unable to obtain a LPFM license The heavy-handed restrictions Congress imposed on the service severely cut the number of available frequencies in most major US cities, as well as in many smaller communities across the country

- After Minnesota Senator Grams' legislation passed, not a single radio frequency was available in Minneapolis Lee Vang of the **Center for Hmong Arts and Talent** had hoped to establish an LPFM station to serve the large Hmong community in Minneapolis **"The airwaves belong to all and [an LPFM station would] give voice to those who have no voice. We are the only Hmong organization in Minnesota, possibly in the world, that focuses exclusively on the arts. Radio is extremely important to our community because 95% of Hmong are illiterate."**

- Currently, only a few short hours of local programming address the Latino communities of Fresno, California **El Comite de los Pobres** had hoped to provide bilingual coverage of local issues affecting Latino workers and farmers **They were just one of many Fresno organizations applying for a license on the only open frequency in town – until Congress closed off the entire FM band for Fresno.**

- **The Newtown Florist Club** wanted an LPFM station to educate the public about the environmental justice in their hometown of Gainesville, Georgia. They also hoped to build stronger community in Gainesville by opening their station to young people from all over town, so they could work together on a common project After Congress decided to play broadcast engineer, there are no remaining frequencies available even in rural Gainesville

The Capital
WEDNESDAY DECEMBER 18 2002 A Capital-Gazette Newspaper — Annapolis, MD

Station looks to make its mark

By J Henson — The Capital

Annette Najjar of West River reads from a book of children's stories during her weekly show on WRYR, a low power radio station in Churchton

Audience limited as WRYR in Churchton gets off the ground

By E B FURGURSON III
Staff Writer

After only few months on the air, low-power radio station WRYR in Churchton is well on its way to meeting the promise of its call letters and motto "We are your radio."

The all-volunteer nonprofit station airs a variety of programming around the clock — jazz, gospel and bluegrass music and shows on local, political and environmental issues, American Indian music and philosophy and even children's literature and music.

The station's philosophy is to provide an outlet for music and talk that may not have a place on *commercial radio*, as well as give a voice to the community.

"By comparison, we are like a community store amongst all the big-box stores," said program director Eric Funk. "We might be hard to find, but we are worthwhile when you get there."

Run on about $400 a month under the auspices of South Arundel Citizens for Responsible Development, its signal is at 97.5 FM.

It uses one of the first low power community radio licenses granted by the Federal Communications Commission last year.

But it is that low power — only 100 watts compared to the 50,000 of some area broadcast stations — that presents the big challenge of reaching its audience.

Complicating the matter is that the signal is broadcast via a computer satellite hookup from

(See RADIO, Page A14)

RADIO

(Continued from Page A1)

across the Chesapeake Bay in Talbot County

As a result, the signal is heard only five miles inland and can be affected by buildings and even trees, factors that don't exactly worry bigger stations, said Michael Shay, a member of the radio station's board The station suggests that a $10 antennae available at Radio Shack will boost reception for most area residents

The problem is tough on the fledgling station In order to get more listeners to spread the word about WRYR, they have to be able to tune in

"It is kind of like the chicken and the egg," Mr Shay said

Still, the station is getting a lot of notoriety in broadcast circles and in the national media A 10-minute segment on low power radio stations featuring WRYR will soon be broadcast on PBS television's *The News Hour with Jim Lehrer*

A Washington media think tank, the Media Access Project, is also heralding the station's leadership in the fledgling low-power community radio movement

"One of the station's central attributes is so many members of the community are involved," said Cheryl Leanza, the organization's deputy director

One of those is West River's Annette Najjar, who runs the station's control board for her children's literature and music show, "What Will We Hear Today?"

For an hour, beginning at 3 p.m. on Thursdays, she spins discs of children's and grownups' music interspersed with three or four children's book readings, all adhering to the theme of the day

"I try to find music that is outside of the mass-market Disney and Nickelodeon stuff," she said

Another unique show is "The Good Red Road," hosted by Southern Maryland residents Jay Winter Nightwolf and Rico Newman They spend two hours on Saturday afternoons speaking about environmental, political and philosophical issues mixed with music from their culture

Mr Winter Nightwolf, a Buffalo Ridge Cherokee, and Mr Newman, tribal spokesman for the a Piscataway-Nonoy tribe in Southern Maryland, appreciate the non-traditional radio outlet allowing another perspective on the air

"To us everybody is a brother or sister But for the family tree to be complete all the branches must be recognized," Mr Winter Nightwolf said

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To find out more about the station and its programming schedule, go to the WRYR Web site, www wryr com

LOW POWER RADIO OVERVIEW:
COMMUNITIES ASK FOR A SMALL SLICE OF THE AIRWAVES

On January 21, 2000 the Federal Communications Commission ("FCC") voted to create a new class of community-based, non-commercial Low Power FM radio stations. Low power FM radio (also known as LPFM) will allow churches, community groups, local governments, schools, and others to apply for a low-watt station that will reach between 1 and 7 miles.

The FCC's decision was a tiny step in the right direction, after years of media consolidation in radio that has reduced not only the number of gatekeepers of information, but also reduced the diversity of broadcast owners and decision-makers.

Even though the FCC decision was designed to protect current broadcasts, both commercial and noncommercial broadcasters who already have licenses sought to prevent others from getting them These broadcasters claimed that the new LPFM stations will harm current broadcasts. Despite seven months of extensions to compile a technical record and a total of almost two years of consideration at the FCC, these broadcasters were unable to prove that the harm they foresee will occur. Instead, the FCC found more persuasive the analysis of experts who found LPFM to be viable. Nevertheless, the FCC significantly scaled back its proposal to accommodate broadcasters' concerns.

Unsatisfied with their gains at the FCC, the National Association of Broadcasters—unfortunately joined by National Public Radio—asked Congress to intervene. Their lobbyists, with significant financial resources and ready-made access to staffers, moved quickly to persuade members of Congress that LPFM would hurt the public by interfering with current broadcasts. They sought to impose a double technical standard on low power radio stations—full power stations could not meet the criteria broadcasters seek to impose on LPFM. Most egregiously, they claimed that low power stations would harm reading for the blind broadcasts, when the FCC took steps to specifically grandfather those broadcasts, protecting them from any interference. In the chaotic final days of December 2000, Congress passed legislation cutting back on LPFM stations. Although Congress unjustifiably cut back on the number of future LPFM stations, it recognized the political danger in eliminating the service.

Broadcasters who already have licenses were seeking to keep new voices out. Without locally owned and programmed outlets, citizens cannot learn about important issues in their communities, they do not know what questions are being discussed in their city council meetings, or being debated by the members of their local school boards. Without that basic information, citizens are unable to participate in civic life, and their views go unheeded by our elected leaders. Low power radio is an important step in linking our communities with each other and with our government.

Supporting low power radio is important because it will show Washington that the American public expects more from broadcasters than they currently provide. Both commercial and noncommercial broadcasters believe they know what the American people should hear and appear impervious to criticism or input. The NAB wants to demonstrate their political muscle by silencing anyone who dares to stand up to them, no matter how worthy the cause. Those who believe in this nation's diversity of voices must support low power radio.

For more information about low power radio, contact Cheryl A. Leanza, Deputy Director, Media Access Project, 202-454-5683, cleanza@mediaaccess.org, or see MAP's LPFM web site at: http://www.mediaaccess.org/programs/lpfm/index.html.

950 18TH ST NW SUITE 220 WASHINGTON, DC 20006
PHONE (202) 232-4300 FACSIMILE (202) 466-7656 http://www.mediaaccess.org

LOW POWER RADIO: TECHNICALLY SOUND AND VASTLY POPULAR

The National Association of Broadcasters ("NAB") has led a scare campaign against low power radio. On January 20, 2000, after a year of intensive analysis, the Federal Communications Commission created a new low power radio service. The House Subcommittee on Telecommunications, Trade, and Consumer Protection recently held a hearing addressing the technical aspects of the FCC's low power radio service. Significant misinformation is being delivered to members of Congress and the public by opponents to low power radio. This information sheet addresses technical and other issues.

Media Access Project ("MAP") has advised a wide-ranging group of churches, community groups, schools, artists, and others who fervently support low power radio. A partial list of those supporters is also attached.

The NAB is wrong that low power radio will harm current broadcasts. At worst, for 100 watt stations, ***less than 1.6 percent*** of the people receiving a new low power radio station will experience any difficulty hearing a current station. With 1-100 watt stations, ***for every 64 to 680 listeners served, only one listener may experience interference.*** Many of these listeners will be able to adjust their radios by moving or rotating them, and will continue to receive the current stations *in addition* to the new low power station. These numbers apply only under worst-case conditions— when the listener experiencing interference has an inexpensive radio and is satisfied with only one or two full-power stations. In other situations, the numbers of people experiencing interference are much lower.

The NAB's audio simulation of the impact of low power radio is not accurate. No FM radio signal would ever sound like the NAB's simulation. This simulation was produced on a computer, and did not use real radio signals. The NAB never presented the simulation for analysis by other engineers — it was not submitted as part of the public FCC record. When the simulation was played in public for the first time at the Subcommittee hearing, the validity of this simulation was strongly criticized by other engineers present. In reality, radio signals experience the "capture effect." Interference between two stations would never produce the sounds on the NAB's simulation.

Under the NAB's analysis, radios today do not work. As demonstrated before the FCC, many radios cannot meet the reception standards proposed by the NAB. Thus, ***defying common sense***, the NAB alleges that most consumers are not satisfied with the radios they own today. The only way the NAB could attack low power radio was to create standards that are impossible for most ordinary radios to meet. In other words, ***the NAB opposes low power radio because small clock radios do not sound like expensive high fidelity sound systems,*** something no consumer would expect.

The NAB incorrectly claims that low power radio will harm radio's transition to digital radio. The two companies performing research and development on digital radio, Lucent Digital Radio and USADR, stated in the FCC's official proceeding that they had ***no objection*** if the FCC removed "third adjacent" protection. This is exactly what the FCC did

The NAB's technical analysis before the FCC was not sound. As part of the FCC proceeding, MAP hired an expert engineer to review the information submitted by the NAB and others. This analysis showed that the NAB's studies were invalid. The experts the NAB hired to refute MAP's study could find ***nothing*** wrong with its analysis. The NAB resorted to accusing MAP's expert of "bias" because he recommended the FCC move ahead on low power radio.

950 18TH STREET, NW SUITE 220 WASHINGTON, DC 20006
VOICE (202) 232-4300 FAX (202) 466 7656 HTTP://WWW.MEDIAACCESS.ORG

The protection standards favored by the NAB could not be applied to current radio stations. If the FCC were to apply the level of protection favored by the NAB to all radio stations, some radio stations would be taken off the air. The NAB cannot justify why a more restrictive level of protection is not acceptable for its members, but should be imposed on new stations.

The NAB falsely alleges that the FCC did not fully consider the technical issues. The FCC conducted an extensive proceeding. The FCC conducted its own technical studies. It delayed the proceeding by more than seven months to accommodate additional technical submissions by the broadcast industry. Some more responsible broadcasters focused their concerns on the areas that were accommodated by the FCC. The FCC significantly scaled back its original proposal when adopting its final decision. The technical submissions in support of low power radio would have justified an even greater change in technical standards than ultimately adopted by the FCC.

Radio Reading Service signals are protected. Signals for radio reading services, also know as reading for the blind, are transmitted *within* the full-power signal that the FCC protected. Full-power broadcasters that transmit radio reading services have the same recourse presently available to combat interference with these signals.

Existing transmitters are protected. Translators that provide small towns with access to a national service, such as National Public Radio, will not be moved or eliminated because of low power radio.

Small-market commercial broadcasters are not jeopardized. The low power service is completely non-commercial. It will not dilute the commercial advertising market. Existing commercial stations *may* feel the prick of competition to provide more innovative programming.

The NAB argument that low power radio will add new "interference" to the airwaves is a red herring. If this argument were sufficient, communications technology must be frozen in time. Any new service, including cellular telephones, digital radio and television, and new hand-held wireless devices add more signals to our airwaves. The right question is how to maximize a scarce resource — the spectrum — to provide *more* services and sources of information to the American people. In every area of communications policy, the FCC has been prodded by Congress to increase competition, provide avenues for new entrants, and maximize the number of uses for our valuable spectrum. The FCC's low power radio service does just that.

The NAB considers any spectrum that is not controlled by its members to be a threat, and thus seeks to kill this service. Do not be fooled by hearing only one side of the story. The groups who support low power radio cannot match the immense resources of the broadcast industry, but they are numerous and spread all over the country.

A list of individuals and groups that support low power radio is attached. Many additional individuals and local organizations filed in support of low power radio at the FCC. These statements of support are available in the FCC's public record. If you require any further information, please do not hesitate to contact Media Access Project at (202) 232-4300. For additional information on Media Access Project and low power radio, see our web site at: www.mediaaccess.org.

Media Access Project is a twenty-seven year old non-profit, public interest, telecommunications law firm that represents the public before the Federal Communications Commission and in the courts.

Low-Power Radio vs. High-Powered Lobbyists

Act now to save America's last chance for local radio.

The National Association of Broadcasters spends over $5 million a year lobbying and hands out more than $1,000 a day to federal candidates.

So when it decided to squelch an FCC plan that lets schools, churches, and civic groups serve neighborhoods with low-power FM stations, unsurprisingly, it won the vote in the House.

The New York Times called the vote "regrettable." The *Washington Post* said it was "a bad idea." *The Los Angeles Times* rushed to defend the FCC, which "works for the American people, not just powerful Washington lobbyists."

The broadcast lobbyists want to keep broadcasting in the hands of a few corporations. Which means that all radio, once the most diverse and local of mediums, sounds the same everywhere. They also want to weaken the FCC and win final say on how America's airwaves, a priceless *public* resource, are allocated in the future. This gives big broadcasters even more power and profits than they had before.

But democracy doesn't mean that the richest, loudest voice wins. Not every time. Not this time.

Low-power radio can still be saved by the Senate. And it will be, if your Senators learn that you've joined thousands of other Americans to support *truly local, non-commercial radio* on a human scale.

Mail the coupons below immediately. You can get your Senators' e-mail addresses at lcweb.loc.gov/global/legislative/email.html

"Low-power for the public"

Low-power FM stations are 10- or 100-watts (compared to 100,000 watt commercial stations) with a range of a few miles. Only community non-profit groups (churches, schools, and others with an educational purpose in a specific geographic area) will be eligible for licenses. Low cost, low-power FM is the last chance for radio to return to its truly local, community-service roots. The FCC was to begin licensing in May until the NAB tried to overturn the plan in Congress.

The NAB's Deceptive CD

In an attempt to pressure Congress, the National Association of Broadcasters fabricated a compact disk simulating interference it claimed low-power FM stations would cause. The FCC itself has denounced the NAB's simulation as "misleading disinformation." Independent analysis has found the NAB's technical case against low-power radio "invalid."

President Clinton
The White House
Washington D.C. 20502

You've promised to oppose any bill that prevents the public from reserving some small part of the airwaves to serve the public good. Senate Bill 2068 – no matter how it's amended – spells the end for truly local, non commercial radio. Don't let it past your desk. Please use your veto.

NAME ______________________

ADDRESS ______________________

CITY/STATE/ZIP ______________________

Senator ______________________
U.S. Senate Office Building
Washington, D.C. 20510

The House voted to weaken the FCC and kill Low Power Radio. I urge you to defeat S. 2068 when it comes up in the Senate. Do we really want to concentrate all media power in the hands of a few corporations? Democracy will be stronger if these truly local, non commercial stations go on air.

NAME ______________________

ADDRESS ______________________

CITY/STATE/ZIP ______________________

Representative ______________________
U.S. House of Representatives Office Building,
Washington, D.C. 20515

The broadcast lobby rushed their low power radio ban through the House before the thousands of community, religious, labor and educational supporters of non commercial low power radio could respond. If there is another vote on the low power radio ban (House-Senate conference bill S. 2068), please vote NO! We can't allow the NAB to kill noncommercial community radio and monopolize the nation's airwaves.

NAME ______________________

ADDRESS ______________________

CITY/STATE/ZIP ______________________

Low-power FM radio is supported by: American Library Association / Communications Workers of America (AFL-CIO) / Department for Communication of the Evangelical Lutheran Church in America / Federal Communications Commission Local State Government Advisory Committee / Leadership Conference on Civil Rights / League of United Latin American Citizens / Low Power Radio Coalition / Media Access Project / NAACP / National Bar Association / National Council of La Raza / National Council of the Churches of Christ, Communication Commission / National Hispanic Foundation for the Arts / National League of Cities / Rainbow-PUSH Coalition / U.S. Public Interest Research Group / United Church of Christ, Office of Communication, Inc. / United Methodist Church General Board of Global Ministries / United States Catholic Conference

Don't let them silence America's real Voice—Yours! For more information, click on www.lowpowerradio.org.

Jointly funded by Public Media Center and Media Access Project (www.mediaaccess.org)

Supporters of Low Power Radio

American Library Association
AFL-CIO
Ben Bagdikian, Berkeley Communications Dept.
Black Citizens for a Fair Media
Jackson Browne
Communications Workers of America
Consumers Union
FCC Local State Government Advisory Committee
Indigo Girls
Int'l Bridge, Tunnel, and Turnpike Association
League of United Latin American Citizens
Louisiana Music Commission
Low Power Radio Coalition
Evang. Lutheran Church in America, Dept. for Com.
Ellis Marsalis
Media Access Project
Gen'l Bd. of Glob. Minist., The United Methodist Church
NAACP
National Bar Association
National Council of Churches of Christ, Com. Comm'n
National Council of La Raza
National Federation of Community Broadcasters
National Hispanic Foundation for the Arts
National League of Cities
Rainbow/PUSH Coalition
Bonnie Raitt
Solveig Singleton, CATO Institute
United Church of Christ, Ofc. of Communication, Inc.
United States Catholic Conference
United States Public Interest Research Group

Human and Civil Rights Organizations
African American Media Incubator
Anti-Racist Action
Cleveland Talk Radio Training Consortium
Cultural Environment Movement
Fairness and Accuracy in Reporting
Massachusetts ACLU
Media Action Network for Asian Americans
Minority Business Enterprise Legal Defense & Education Fund
Minority Media and Telecom Council
National Asian American Telecom Assoc
National Association of Black Journalists
National Council of La Raza
National Hispanic Council on the Aging
National Hispanic Media Coalition
National Indian Telecommunications Inst
National Latino Telecommunications Taskforce
National Lawyers Guild
NOW Legal Defense and Education Fund
Native American Journalists Association
Puerto Rican Legal Defense and Education Fund
The Civil Rights Forum
The Feminist Majority
Watsonville, CA Human Rights Committee

Media Organizations
Americans for Radio Diversity
Citizen's Media Corps
Denver Radio Coalition
Detroit Metro Times
Metro Detroit Broadcasting Corporation
Microradio Empowerment Coalition
Mondellus Pressa and Haitian Community Radio
Mount Pleasant Broadcasting Club
National Federation of Community Broadcasters
Project on Media Ownership
Prometheus Radio Project
Real Detroit
Women's Institute for Freedom of the Press

Consumer and Environmental Orgs.
Commercial Alert
Consumers Union
Ralph Nader
Jamie Love, Director, Consumer Project on Technology
Telecom Research and Action Center

Libraries and Schools
Black College Communications Assoc
Brookland High School, Brookland, AK
El Cerrito High School, El Cerrito, CA
George Washington University
Libraries for the Future
Middle Country, NY, Public Library
New School for Social Research
Pomona College
University of Washington

Governmental Entities
City of Berkeley
33 Michigan Cities and Counties
76 Michigan State Legislators
New York State Thruway Authority Port Authority of New York and New Jersey
City of Santa Monica
Cty of Seattle, Citizens Telecom and Technology Advisory Broad

Musicians and Artists
Detroit Blues Society
Ian MacKaye (Fugazi)
Jam Rag
Michigan Music is World Class Campaign
Jenny Toomey
Mike Watt
Zeitgeist Community Gallery of Cambridge, MA

Academics and Scholars
Barbara Ehrenreich, Author
Stuart Ewen, Author
David Barsamian, Director, Alternative Radio
Elaine Bernard, Harvard Trade Union Program
Chairman Chris Campbell, Xavier Univ
Mark Crispin Miller, New York University
Ron Daniels, Center for Constitutional Rights
Dee Dee Halleck, Deep Dish TV
Loretta Ross, Nat'l Ctr for Human Rights Education
Herbert Schiller, Prof Emeritus, Univ of CA, San Diego
Juliet Schor, Harvard University
Howard Zinn, Professor Emeritus, Boston University

Religious Organizations
Abyssinian Baptist Church
Catholic Archdiocese of Detroit
Council of Calvin Christian Reformed Church
Jewish Center of Crown Heights
National Religious Broadcasters, Caribbean Chapter
The Society of Friends

College Radio General Managers
Bradley University
Brown University
Carthage College
Fashion Institute of Technology
Furman University
Georgetown University
Long Beach City College
Miami (Ohio) University
Northern Illinois University
Oklahoma State University
Penn State Harrisburg
St Norbert College
St Louis University
Seattle University
Suffolk University
Texas A&M
University of Arizona
University of California-Pomona
University of Maryland
University of Michigan-Dearborn
University of North Carolina-Wilmington
University of South Florida
University of Wisconsin-Madison
Webster University
Winthrop University

Low Power Radio Coalition

The Power of Low Power Radio

Low Power FM stations are community-based, non-commercial radio stations that operate at 100 watts or less. Allowing Low Power FM radio stations on the air empowers local broadcasters to serve their communities with a variety of new voices and services. Low Power radio stations are able to address specific groups including minority groups, the religious community, and linguistic minorities, and provide a forum for debate about important local issues. LPFM stations strengthen community identity in urban neighborhoods, rural towns and other communities that are currently too small to win much attention from "mainstream," ratings-driven media.

Low Power Radio Service Established

The FCC has licensed low wattage radio stations for decades but in the 1970s the FCC stopped issuing those licenses. In January 1999, the FCC issued a Notice of Proposed Rule Making to establish two distinct classes of community-based, non-commercial low power FM radio stations. Thousands of potential broadcasters, including schools, churches, musicians, engineers, media activists and people from all walks of life filed comments in the Rule Making, demonstrating enormous popular support for this new class. In January 2000, the FCC voted in favor of creating a license for community-based, non-commercial Low Power FM radio stations. This was a huge victory for communities nationwide where, in many instances, consolidation of commercial media outlets has led to decreased localism and diversity on the airwaves.

Opponents Warn of "Oceans of Interference"

Incumbent broadcasters,represented for the most part by the National Association of Broadcasters, opposed the idea. In it its testimony before Congress, the NAB warned that the FM radio dial would be drowned in "an ocean of interference" if the FCC was allowed to go forward with Low Power radio licensing. Most observers agreed that this was a red herring and masked the broadcasters real concern, that these new stations would represent additional competition for listeners for incumbent broadcasters.

How the FCC Regulates Interference

The FCC has been regulating radio and setting interference standards for seventy years. The existing FCC rules mandate that full-power radio stations – from 6000 to 50,000 watts – be licensed at intervals on the dial to prevent interference. When considering the addition of Low Power stations, FCC engineers determined that micro radio stations could be placed between existing stations without technical harm, therefore relaxing the stringent interference protections to accommodate small 100 watts would not have a detrimental effect on existing signals. In part the FCC engineers

What is Low Power FM?

Though the FCC has licensed low-wattage stations for decades, the Low Power Radio Service was adopted by the Federal Communications Commission in January 2000. The service is designed to provide broadcasting outlets for local organizations unlike the many current centrally programmed commercial stations that exist across the country.

Who can get a license to operate a Low Power Radio station?

This radio license is available to community groups, local schools, labor unions, churches and other nonprofit organizations that would like to reach out to a small, geographically concentrated group of individuals.

How many Low Power Radio stations are operating in the US today?

About 150 radio stations, broadcasting at 100 watts or less, are currently successfully serving communities across the country, with many more in the process of applying for a license.

Low Power Radio Works

In **Opelousas, Louisiana**, the **Southern Development Foundation** (SDF) works for school reform, community supported agriculture, and neighborhood economic development. They also host the world's largest traditional Zydeco music festival. The SDF is the first civil rights organization in the United States ever to own its own radio station. They host current affairs talk shows with many major politicians around the state, musical events, and religious programming. Their executive director, John Freeman, says, "We pride ourselves on being part of this democratic project."

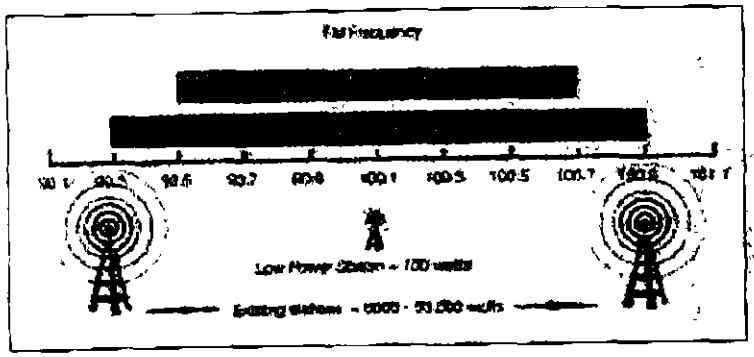
In **Ocean City, Maryland**, the **Edinboro Early School** has been running for over a year, broadcasting 24 hours a day. Their goal is to recreate the flavor of an early 50's radio station, with family oriented programming focusing on music of the fifties and early sixties, with some classical music mixed in. They have 3 hours of programming a day for children from 3-5 years old, reaching schools, daycare centers, and homes around the city. The station itself is based in The Gold Coast shopping mall, with glass walls on three sides of the broadcast booth so community members can see what's happening in the station. Other programming includes real estate and finance talk shows, a church news bulleting board, and field broadcasts from historical sites.

based their recommendation on their experience with stations that already resided within three channels of separation, many of which had been grandfathered in before the current – and more stringent – interference rules had been implemented.

Based on their experience, the FCC decided that LPFM licenses would be made available on open frequencies at least three adjacent channels away (.6 MHz in either direction) from existing transmissions in the same area. In 2000, the FCC opened the applications window and began the licensing process.

Appropriations Rider Curtails LPFM Availability

Unfortunately, the availability of channels for LPFM was curtailed soon after that when a rider was tacked onto an appropriations bill in December 2000. Responding to tremendous pressure from the broadcast lobby, the "Radio Broadcasting Preservation Act" forced the FCC to adopt an exorbitant protection standard of four channels in either direction, or .8 Mhz, a distance that exceeds the standards imposed on existing frequencies.



The language in the appropriations rider eliminated about 75 percent of the original Low Power FM opportunities. This hit the more densely populated areas and cities particularly hard, leaving only one new station available in the top fifty American cities.

The appropriations rider also took away the FCC's ability to manage interference issues on its own. The rider decreed that the FCC could not change existing interference requirements to accommodate LPFM stations, and required the FCC to hire an outside entity – the MITRE Corporation – to conduct field tests to resolve the issue of LPFM's potential for third adjacent channel interference. The results would be presented to Congress, which would then determine whether to allow the licensing of low power radio in more populated areas.

Low Power Radio's Success

Despite the elimination of over 75 percent of the licensing opportunities because of the stringent interference requirements, LPFM is a remarkable success. Thousands of organizations have applied for licenses, and about

150 stations are on the air now Moreover, LPFM stations are having a remarkable impact, offering local non-commercial programming that meets the needs of the communities they serve

MITRE Study Results Released: Interference Not An Issue

After three years of inquiry and testing, the interference study was released in July 2003. The MITRE Corporation found no significant problems with third adjacent channel interference and recommended the lifting of burdensome restrictions imposed by Congress in December 2000 upon the new LPFM radio service. In other words, the interference issues raised by the NAB were, as predicted by Low Power advocates, a red herring.

The MITRE study proves definitively that Low Power FM stations can operate without interfering with existing station signals

Only Congress Has the Power to Let Low Power Radio Flourish

After hundreds of thousands of American citizens told their legislators and regulators at the FCC that they supported ownership limits on the corporate media, the Senate Commerce Committee has recently taken leadership on media issues Senators in the Commerce Committee have organized many hearings, and sponsored pending legislation that addresses the influence major media corporations have in our lives

Now that the MITRE study has proven that interference is not an issue, it will take congressional action to put Low Power radio back on track for serving America's cities We see Low Power radio as one of the antidotes to the effects of media concentration that the FCC has unleashed.

We know there's room in America's dialogue for many voices from many communities. Support their right to be heard **Support LPFM.**

Partial List of Organizations Supporting Low Power FM:

- Media Access Project
- Prometheus Radio Project
- Future of Music Coalition
- National Federation of Community Broadcasters
- American Library Association
- AFL-CIO
- Ben Bagdikian, Berkeley Communications Dept.
- Black Citizens for a Fair Media
- Jackson Browne
- Communications Workers of America
- Consumers Union
- FCC Local State Government Advisory Committee
- Indigo Girls
- Int'l Bridge, Tunnel, and Turnpike Association
- League of United Latin American Citizens
- Louisiana Music Commission
- Evang. Lutheran Church in America, Dept. for Com
- Ellis Marsalis
- Gen'l Bd. of Glob. Missn. The United Methodist Church
- NAACP
- National Bar Association
- National Council of Churches of Christ, Com. Comm.
- National Council of La Raza
- National Hispanic Foundation for the Arts
- National League of Cities
- Rainbow/PUSH Coalition
- Bonnie Raitt
- Solveig Singleton, CATO Institute
- United Church of Christ, Off. of Communication, Inc.
- United States Catholic Conference
- United States Public Interest Research Group

Low Power Radio Coalition

1615 L Street NW, Suite 520 • Washington, DC 20036
202 429 8855 • http://www lowpowerradio us

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